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August 28, 2015

VIA ECF and Facsimile (212) 805-0426

The Honorable Laura Taylor Swain
United States District Court Judge
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: Manuel De Jesus Rosario v. Mis Hijos Deli Corp., Palma
Grocery Corp., 251 E. 123rd St. Realty, LLC, Jose Palma,
Leonida Collado, and Junior Palma
Case No.: 15-CV-6049 (LTS)(DCF)
FCDSMT File No.: 36584**

Dear Judge Swain:

This firm represents defendants Mis Hijos Deli Corp., Palma Grocery Corp., 251 E. 123rd St Realty, LLC, Jose Palma, Leonida Collado, and Junior Palma (collectively “Defendants”) in the above-referenced case. Pursuant to Your Honor’s Individual Practices, we respectfully write to request that the time for Defendants to answer, move against, or otherwise respond to the Complaint in this case be extended up to and including September 30, 2015. Defendants’ response to the Complaint is currently due on August 31, 2015. This is Defendants’ first request for an extension. Our office has conferred with counsel for the Plaintiff, Steven B. Ross, Esq., who consents to Defendants’ application. In this regard, we respectfully submit for Your Honor’s consideration a proposed Stipulation signed by this office and Plaintiff’s counsel, extending Defendants’ time to answer, move against, or otherwise respond to the Complaint.

We respectfully request Your Honor “So Order” the enclosed Stipulation, and we thank the Court for its time and consideration.

Respectfully submitted,



Alexander Leong

Encl.

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